

Comments on Reasonable Grounds to Conduct an Aquatic Life Use Attainability Analysis for Straight Creek

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Overall, the draft document provides sufficient justification (pages 8-15) to conduct Aquatic Life Use Attainability Analysis for Straight Creek, Lee County. However, some issues of concern are noted below.

Why the TMDL implementation plan and the UAA are on the same timeline (page 5)? Ideally a UAA should be done before the TMDL report so it can define if the designated uses are appropriate. If UAA shows a designated use cannot be attained (for example, considering potential socio-economic burdens) then the segment can be delisted before an expensive TMDL study is initiated. In the case of Straight Creek, the TMDL report is already done and it appears that the TMDL IP is underway. The simultaneous and parallel track UAA and TMDL IP does not serve any meaningful purpose. If the UAA goes forward, the implementation should be delayed until the UAA study shows where the resources should be distributed for effective stream restoration.

A few other comments related to the report adequacy are listed below.

1. The report does not indicate the length or extent of biological (aquatic life) impairment. Does this overlap the same stream segment with other use impairments?
2. Under Project Statement (page 2, line 3) it's stated that "Virginia DEQ has studied conditions in the creek and determined that the uses may be restored through implementation of controls on bacteria, Total Dissolved Solids (TDS), and Total Suspended Solids (TSS) sources in the Straight Creek watershed." If control on these parameters is implemented, one would expect some level of improvement in aquatic life support as well. The report does not provide a citation for the DEQ study. Also, the citation for VSCI study (page 2, last line) should be provided. Where is the reference stream for Straight Creek? What's the VSCI for the reference stream?
3. What's the significance and relevance of UAA's in Kansas and Alaska cited in the bottom of page 3.
4. Inclusion of more photos about stream condition will help the reader understand the existing condition of the Straight Creek.